

Exhibit 7

DAVID BENJAMIN **HIGHLY CONFIDENTIAL** 8/29/2018

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1

2 UNITED STATES DISTRICT COURT

3 WESTERN DISTRICT OF TEXAS

4 AUSTIN DIVISION

5 -----x

6 UMG RECORDINGS, INC., et al.,

7 Plaintiffs,

8 -against-

9 GRANDE COMMUNICATIONS NETWORKS LLC,

10 Defendant.

11 No.: 1:17-cv-00365-LY

12 -----x

13 919 Third Avenue
14 New York, New York

15 August 29, 2018
16 9:14 a.m.

17 Highly Confidential Videotaped
18 Deposition of a Plaintiff, UNIVERSAL MUSIC
19 GROUP by DAVID BENJAMIN, pursuant to Notice,
20 before Christine DeRosa, a Notary Public of
21 the State of New York.

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1 A P P E A R A N C E S:

2 STEIN MITCHELL CIPOLLONE BEATO & MISSNER LLP

3 Attorneys for Plaintiffs

4 901 15th Street, NW, Suite 700

5 Washington, DC 20005

6 BY: ROBERT B. GILMORE, ESQ.

7

8 ARMSTRONG TEASDALE LLP

9 Attorneys for Defendant

10 7700 Forsyth Boulevard, Suite 1800

11 St. Louis, Missouri 63105

12 BY: ZACHARY C. HOWENSTINE, ESQ.

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14

15 ALSO PRESENT:

16 JOE BARRION, Videographer

17 ALASDAIR J. McMULLAN, In-house counsel,

18 Universal Music Group

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1 A. It is.

2 Q. I'd like to jump up in the chain
3 a little bit. There's an e-mail you sent on
4 November 16, 2011, this is on the first page,
5 appearing to respond to Mr. Sabec saying,
6 "Where are you on this? I assume you are
7 still working with Hughes on a test of your
8 ability to track multiple infringements." Do
9 you see that?

10 A. I do.

11 Q. What was this test for
12 Rightscorp's ability to track multiple
13 infringements?

14 A. I don't recall.

15 Q. Do you recall discussing with
16 Rightscorp their ability to track multiple
17 infringements?

18 A. No.

19 Q. At any point in time, not just at
20 this point in time?

21 A. Correct.

22 Q. Did you ever have any
23 conversations with Mr. Sabec or anyone at
24 Rightscorp about the capabilities of
25

1 Rightscorp's detection system, for lack of a
2 better term?

3 A. I don't recall.

4 **Q. At any point in time?**

5 A. I don't recall.

6 **Q. Okay. You can set that aside.**

7 MR. HOWENSTINE: This will be
8 Benjamin Exhibit 4.

9 (Benjamin Exhibit 4, e-mail
10 correspondence Bates-stamped UMG
11 00012713 through UMG 000127716, marked
12 for identification.)

13 **Q. I'll give you a moment to look**
14 **that over and then I'll ask you some questions**
15 **about it.**

16 **This Exhibit 4 is an e-mail chain**
17 **that was produced in this case with UMG**
18 **00012713. Does this appear to be an e-mail**
19 **exchange that you participated in?**

20 A. Yes.

21 **Q. Do you recall this particular**
22 **exchange?**

23 A. I'm reading it. Other than that,
24 no.

25